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6 *Attorney for Plaintiffs*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 ***

10 TAYLOR SOMMER, individually; TAYLOR
11 SOMMER, as the Administrator of the ESTATE
12 OF REINER SHAWN SOMMER, deceased,

13 Plaintiffs,

14 vs.

15 CITY OF LAS VEGAS, NEVADA, a political
16 subdivision of the State of Nevada; LAS
17 VEGAS METROPOLITAN POLICE
18 DEPARTMENT, a political subdivision of the
19 State of Nevada; KEVIN McMAHILL,
20 individually and as a policy maker and Sheriff of
21 LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT; SERGEANT GERALD
23 BAGAPORO, individually and in his official
24 capacity; SERGEANT JEFFREY BLUM,
25 individually and in his official capacity;
26 OFFICER ANDREW GARCIA, individually
and in his official capacity; OFFICER JOSEPH
ORTEGA, individually and in his official
capacity; DOE LAS VEGAS METROPOLITAN
POLICE DEPARTMENT SUPERVISORS I
through X, inclusive; ROE LAS VEGAS
METROPOLITAN POLICE DEPARTMENT
OFFICERS XI through XX, inclusive,

27 Defendants.
28

Case No.: 2:23-cv-01682-GMN-NJK

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION FOR PARTIAL
DISMISSAL [ECF #6] (FIRST REQUEST)**

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COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*, “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; KEVIN McMAHILL; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and through their undersigned counsel of record, and hereby stipulate and agree as follows:

1. The Defendants hereto filed a Motion for Partial Dismissal on November 7, 2023 [ECF #6]. A response to said Motion is presently due on or about November 21, 2023.
2. The Thanksgiving holiday is rapidly approaching. Plaintiff’s counsel has family visiting for the holidays and various associated social obligations. In addition, Plaintiff’s counsel recently returned from a vacation and has had other work obligations that have greatly reduced the time available to respond to the subject motion.
3. Based upon the foregoing, Plaintiffs’ counsel has requested and shall be granted an extension of time in which to respond to Defendants’ Motion to Dismiss until December 8, 2023.

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4. This Stipulation is made in good faith and not for purpose of delay.


DATED this 17th day of November, 2023.

ROGER P. CROTEAU & ASSOCIATES, LTD.	MARQUIS & AURBACH
<u>/s/ Timothy E. Rhoda</u>	<u>/s/ Craig R. Anderson</u>
ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 West Charleston Blvd., #67 Las Vegas, Nevada 89102 702-254-7775 croteaulaw@croteaulaw.com <i>Attorney for Plaintiffs</i>	CRAIG R. ANDERSON, ESQ. Nevada Bar No. 6882 10001 Park Run Drive Las Vegas, Nevada 89145 702-382-0711 canderson@maclaw.com <i>Attorney for Defendants</i>

ORDER

IT IS SO ORDERED:

Dated this 17 day of November, 2023.


 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of November, 2023, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR PARTIAL DISMISSAL [ECF #6]** **(FIRST REQUEST)** to the following parties:

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/s/ Timothy E. Rhoda

An employee or agent of ROGER P.
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